

1 A Okay, and why we're in court is 4A La Grande
2 Princess is a two-story building, two-story structure,
3 concrete. That is valued at \$600,000.

4 Q That's the last current appraisal?

5 A That's a current appraisal. I also have with the
6 bank four, that's 4A, then we have 6A La Grande Princess.
7 See what I did when I borrowed the money I put up these
8 different properties, 4A La Grande Princess is valued at
9 \$250,000.

10 Q Oh, I thought you just \$600,000. Maybe I
11 misunderstood.

12 A That's 4A, I'm talking about 6A, sir.

13 Q Oh, okay. So 4A is valued at \$600,000?

14 A Yes.

15 Q Okay, and 6A is valued at --

16 A No, no, no.

17 Q Okay.

18 A 4A La Grande Princess is a two-story structure.

19 Q Right.

20 A And that is valued at \$600,000.

21 Q Okay.

22 A In excess of \$600,000.

23 Q Okay.

24 A Okay, 6A La Grande Princess is valued at I dare
25 \$200,000.

1 Q All right.

2 A Then now I have, which -- Another property that I
3 had put up is known as 6H, it's H, Catherine's Rest. That's
4 another one, 6H Catherine's Rest.

5 Q Is that a developed property?

6 A Yes. That is a two-story apartment house, four
7 apartments, 6A, 6H Catherine's Rest.

8 Q Okay, and what is the approximate value of that?

9 A The approximate value of that should be about
10 \$400, my estimation would be about \$400,000.

11 Q You had also mentioned that there was 6C La Grande
12 Princess, did I understand that right?

13 A 6C La Grande Princess is also there sir.

14 Q Is that subject to the bank lien as well?

15 A Yes, that's also with the bank lien.

16 Q And what is the value of 6C?

17 A The value of that is just an empty, it's just
18 empty land. When I say empty, undeveloped land.

19 Q Okay.

20 A And it's about an acre and a half, and that is
21 valued at something like \$25,000 or \$50,000, well \$50,000.
22 So we're now in court with 6H Catherine's Rest. We are in
23 court with 4A La Grande Princess, also with 6A La Grande
24 Princess, and 4C La Grande Princess.

25 Q Okay, 4C or 6C?

1 A No, no. It is 4A, is a two-structure that is
2 valued at \$600,000, and then I have 4C La Grande Princess.
3 May I have a piece of paper so I can write those down?
4 Thank you. I got it.

5 Let's see, about \$150,000. Okay, this is a two-
6 story, 4A La Grande Princess is also a two-story structure.
7 6A is a two-story structure. It's an apartment house and it
8 has four apartments, and this was. Yes. This was appraised
9 recently at \$250,000. Now why we're in court --

10 MR. COLBY: Should we make this a deposition
11 exhibit?

12 THE WITNESS: You may. What?

13 MR. SHOOK: Yes. I'm not quite finished with this
14 area, but then when we are --

15 THE WITNESS: Okay. Why we are in court --

16 MR. SHOOK: -- we'll make that --

17 MR. COLBY: We could straighten out the spellings
18 and the amounts.

19 MR. SHOOK: Right.

20 THE WITNESS: Why we are in court is because when
21 the court, the territorial court -- Well, first I was,
22 because of my illness I couldn't make any payment and didn't
23 do much work and everything went haywire. This property at
24 4A La Grande Princess, when the bank foreclosed on us we
25 went to the -- My son, who is presently the Lieutenant

1 Governor of the Virgin Islands and he -- Incidentally, he
2 lost in the past election.

3 He went to purchase this and the people at the
4 bank told him they weren't selling the property. They went
5 ahead and sold the property to The Continental. Okay? So
6 The Continental has this property now. So we are in court,
7 again, I am saying that I know that we have records to show
8 that we owe \$325,000 something like that is now owed to the
9 bank, and my argument in court is the fact that I don't know
10 how much this was sold for.

11 BY MR. SHOOK:

12 Q Oh, the bank hasn't told you yet?

13 A The bank didn't say how much it was sold for.
14 However, in my appraisal, it's \$600,000 which would have
15 been sufficient to cover the amount that is owed of the
16 \$325,000. Okay? So the bank took this property.

17 MR. COLBY: Well, if you keep marking it up it
18 won't be a good exhibit, and they won't be able to read
19 the -- Why don't you just not mark it further?

20 MR. SHOOK: Why don't we talk it out first and
21 then if it's necessary to correct the paper at all --

22 MR. COLBY: I don't want to just ruin the exhibit,
23 what you've done to the exhibit --

24 MR. SHOOK: -- we can do that.

25 THE WITNESS: You can see that.

1 BY MR. SHOOK:

2 Q All right. I'll recap the situation.

3 A Sure.

4 Q And if it turns out my understanding is not
5 accurate you can correct me. The litigation over what it is
6 that Family Broadcasting owes the bank is related to the
7 values and whatever it is that may have happened with the
8 four properties that you've been talking about and those
9 four properties are 4A La Grande Princess, 6A La Grande
10 Princess, 6C or 4C La Grande Princess?

11 A 4C.

12 Q 4C. Okay. 4C La Grande Princess.

13 A 4C La Grande Princess.

14 Q And 6H Catherine's Rest.

15 A 6H Catherine's Rest.

16 Q Catherine's Rest.

17 A Right.

18 Q And the bank when it foreclosed on these, I take
19 it what the bank tried to do or what the bank has done has
20 foreclosed on all four of these properties?

21 A All of them.

22 Q It has already sold --

23 A 4A.

24 Q -- 4A?

25 A Yes, it has.

1 Q La Grande Princess, and what we don't know yet is
2 what the bank actually received for that sale.

3 A For the sale. That's true.

4 Q And depending on what the bank received it may be
5 that the entire amount that Family Broadcasting owed has
6 been covered by the proceeds of this sale?

7 A True.

8 Q That's something we don't know yet?

9 A We don't know. So we are now, since a decision
10 was rendered for the foreclosure in the Territorial Court we
11 appealed, I appealed, in the District Court. So in the
12 appellate section, in the Virgin Islands you go from the
13 Territorial Court to the District Court, and then if the
14 decision is not satisfactory to me, then I have the right to
15 go to the Third Circuit. That's the procedure we go.

16 Q So currently there is an appeal by you on behalf
17 of Family Broadcasting to the United States District
18 Court --

19 A District Court.

20 Q -- in the Virgin Islands?

21 A That's correct, sir.

22 Q The United States or the Virgin Islands
23 Territorial Court, did it render a written decision?

24 A Yes, they rendered a decision of foreclosure.

25 Q Approximately how long ago was this decision

1 rendered?

2 A I don't recall exactly, but I can get that
3 information and give it to you. I can give you a copy of
4 the decision of the court.

5 Q That would be good.

6 A I'll mail it to you and send it to you?

7 Q Why don't you send it to me.

8 MR. COLBY: Why don't you fax it to me and then
9 I'll fax it to him.

10 THE WITNESS: I'll get it, what's necessary to
11 him.

12 BY MR. SHOOK:

13 Q Your court appeal as well? Your appeal to the
14 United States District Court, I take it, that's in writing?

15 A Oh, that's in writing.

16 Q There's been a brief that's been prepared and
17 filed?

18 A The brief has been prepared and filed. Yes, sir.

19 Q Could you send Mr. Colby a copy of that as well?
20 Then I can get that from you.

21 A Okay. I'll just have to make copies of the brief
22 and then I'll send it to him.

23 MR. COLBY: Correct. Just by fax.

24 THE WITNESS: You don't want me to fax them.
25 That's a lot of pages.

1 MR. COLBY: Oh, really?

2 THE WITNESS: Yes, Lauren.

3 MR. COLBY: All right. FedEx.

4 THE WITNESS: That's a lot of pages.

5 MR. COLBY: FedEx then. You get it.

6 THE WITNESS: However you want to get it to Mr.
7 Colby is fine.

8 MR. COLBY: Well, the mail takes forever from the
9 Virgin Islands.

10 MR. SHOOK: Oh.

11 MR. COLBY: It takes a long time.

12 BY MR. SHOOK:

13 Q So that I understand, these, the four properties
14 though that we've been talking about 4A, 4C, 6A La Grande
15 Princess and 6H Catherine's Rest are at this point under
16 some kind of cloud because of the foreclosure action?

17 A Right. That's correct. There is a cloud in
18 there.

19 Q Now the other properties that you mentioned
20 though, 83 Anna's Hope, 82 Anna's Hope, the 12 acres of
21 undeveloped land --

22 A Twelve acres on Catherine's Rest.

23 Q -- on Catherine's Rest, those have no cloud over
24 them?

25 A None whatsoever.

1 Q Are there any other properties that you or your
2 wife has that are not under a cloud of any kind?

3 A We have another property in town. We have a
4 property in town. It's, well, the number is 6 or 7 Western
5 Suburb.

6 Q How do you spell that?

7 A W-E-S-T, Western.

8 Q Oh, Western.

9 A -- E-R-N, Suburb, S-U-B-U-R-B.

10 Q When you say in town you mean Christiansted?

11 A In Christiansted, in town. That's another
12 property we own.

13 Q Is that developed or undeveloped?

14 A It's undeveloped.

15 Q What is the value of that so far as you know?

16 A Well, being that it's a town property, I would say
17 about \$220,000.

18 Q What is your understanding as to the yearly taxes
19 on that property?

20 A The early taxes? It's vacant land and the yearly
21 taxes would not exceed \$100. That's vacant land. It's
22 vacant land and it's a piece of land that is between a two-
23 story structure and another building.

24 Q Is there any other real property that either you
25 or you wife own?

1 A No, not that I own or my wife. My wife's sister
2 just recently died and she -- Her sister had no children so
3 it went to living heirs of the sister, who were two sisters,
4 it's my wife and her sister. That property is now being
5 turned over to our niece. So actually she doesn't own it.
6 So I just mention that in passing.

7 Q But this a property that by law or is it by will
8 went to your wife and I guess another sister?

9 A Yes, by probate, through probate. Yes.

10 Q And your wife is, so far as you know, selling her
11 share or giving her share to --

12 A It's not sold, she is -- It's being given to the
13 niece.

14 Q Other than the commercial properties which are
15 under the bank cloud, do the other properties that we have
16 discussed produce any kind of income?

17 A No. Well, 83, we live in 83, 82 is vacant. When
18 I say vacant, there's a structure there, as a matter of fact
19 we just finished using that as the headquarters for my son,
20 for his election, so, but it's not rented.

21 Q So would the answer to my question be that none of
22 these properties produces income?

23 A No income.

24 Q All of the properties that you had mentioned that
25 are not subject to the bank foreclosure, again, are any of

1 those properties subject to a mortgage?

2 A Which ones?

3 Q 83 Anna's Hope, 82 Anna's Hope?

4 A No, no mortgage.

5 Q I'll do it one at a time, 83 Anna's Hope, no
6 mortgage?

7 A No mortgage.

8 Q 82 Anna's Hope?

9 A No mortgage.

10 Q No mortgage. Catherine's Rest?

11 A No mortgage.

12 Q No Mortgage.

13 A There's also another one in Catherine's Rest that
14 I have there that has a house on it. I don't know. I think
15 it is 6J. I may be wrong. It has a structure on it, 6J. I
16 can get the full details on that. That is rented at \$200 a
17 month. There is a, it's a one bedroom house with bath,
18 living room, kitchen.

19 Q So that one, that one produces rental income of
20 \$200 a month?

21 A Yes.

22 Q Is that property in your name or in your wife's
23 name?

24 A That's in my name and my wife's name.

25 Q All right. I'm a little confused and it may be

1 that I just didn't hear you properly. With respect to
2 Anna's Hope, is Anna's Hope in --

3 A I can --

4 Q Let me ask the question and then if I'm all
5 confused here you can straighten me out. Is 83 Anna's Hope
6 in your wife's name only?

7 A Yes, sir.

8 Q There was a time though when it was in the name of
9 both yourself and your wife?

10 A Yes, it was.

11 Q Approximately when did it go from yourself and
12 your wife to just your wife?

13 A When I got ill, prior to getting ill, I did that.

14 Q So you made the transfer to your wife roughly
15 December of 1999?

16 A In 1999, around 1999, I deeded everything to my
17 wife.

18 Q But you had indicated, I believe, that there was a
19 time when 83 Anna's Hope was in your name only.

20 A Yes, there was a time. It was in my name until I
21 deeded it to her.

22 Q Okay. Let me start over again and you'll either
23 see why I'm confused or anyway we'll try to get this
24 situation straightened out. From December of 1999,
25 approximately, to the present 83 Anna's Hope is in your

1 wife's name.

2 A Yes, sir.

3 Q Prior to that the property was in your name and
4 your wife's name?

5 A Yes.

6 Q Was there a time though when the property was in
7 your name only?

8 A It came into my name only when I received it from
9 the government. As I told you, it was given to those of us
10 who had been, have military connections. Okay?

11 Q So approximately when, if you can remember, did
12 the title to the property, 83 Anna's Hope go from you to
13 yourself and your wife?

14 A I'll be honest with you. I don't recall when, but
15 I can check the records and let you know. I'll have a title
16 search done on it and send you that, sir.

17 Q It isn't so much that I need a title search. I
18 don't need exactitude. I'm just trying to get a general
19 idea of --

20 A No. That's what I'm saying. I am unable at this
21 present time to say to you when the transfer was made from,
22 to my wife and myself from me.

23 Q All right. That would be acceptable. Well,
24 however you go about if you could then relay that
25 information to Mr. Colby and he in turn can tell me. With

1 respect to 82 Anna's Hope, the property is in your wife's
2 name alone?

3 A Yes.

4 Q And that occurred also around December of 1999?

5 A Around the same time, yes.

6 Q Prior to that was the property owned by yourself
7 and your wife?

8 A Yes. Well, as a matter of fact when we bought
9 that, we bought that from an individual who had gotten the
10 property the same time I got it and then he decided he was
11 moving from St. Croix to go to St. Thomas and I bought it
12 from him.

13 Q Roughly, when did you buy that property?

14 A I bought that property, I dare say, in I think
15 around 1985, around 1985 somewhere around that period.

16 Q When you bought the property then was it purchased
17 both in the name of yourself and your wife?

18 A Yes. I may be wrong on the year, but I can do a
19 title search on that also and let you know.

20 Q But roughly 1985, will work for me at this point,
21 if that also comports with your understanding.

22 MR. COLBY: This is going to be the exhibit so if
23 you want to write on something else, why, use another piece
24 of paper.

25 THE WITNESS: Okay.

1 MR. COLBY: Maybe we could stop and something to
2 eat at this point. I'm getting pretty hungry. It's way
3 after my usual lunch time in Frederick.

4 MR. SHOOK: Well, if you don't mind, if I could
5 just cover this area because it could be difficult to pick
6 up again.

7 THE WITNESS: No go ahead.

8 MR. COLBY: Oh, yes.

9 THE WITNESS: No you can. I'm not eating. I'm
10 not hungry. Let me point it, make it very clear. I have a
11 habit that I eat every morning. I get breakfast in the
12 morning and I don't eat anything until midnight, until
13 night.

14 MR. SHOOK: Whoa.

15 THE WITNESS: Okay? So with me, it's all right
16 with me. We can, whatever you gentlemen would like to have
17 is all right.

18 MR. SHOOK: No. I just, I want to clear up to the
19 extent I can the ownership situation of these various
20 properties and then we can break.

21 BY MR. SHOOK:

22 Q All right. The next property then that I want to
23 look at or try to get a handle on is the 12 acres of
24 undeveloped land at Catherine's Rest. That currently is
25 owned by your wife only?

1 A It was my property and I turned it over to my
2 wife.

3 Q In December of 1999?

4 A I think that you'll find in my wife's and my name,
5 I think. I'll have to check it out, I'll be honest with
6 you.

7 Q So it may be that the undeveloped land is --

8 A No. See this land was owned by my father and when
9 my father died it passed over to the sons and then my other
10 brothers -- There was, I had to pay some money on it and
11 then they said, hey, since you've done that you may as well
12 have it. So it was turned over to me.

13 Q So there was a time when it was yours alone?

14 A Yes, I'll have to do a title search on that so I
15 can see.

16 Q But in terms of the current ownership of the 12
17 acres of undeveloped land on Catherine's Rest?

18 A My wife's name is on it now. Asta K. James name
19 is on it.

20 Q And do you know whether it's her name alone or
21 whether it's her name and your name?

22 A I'm certain that both names.

23 Q Both names?

24 A Sure, but to be on the safe side I'll do a title
25 search and then I'll get it back to you.

1 Q And at least for purpose of our conversation now
2 you believe you added your wife's name to that deed roughly
3 in December of 1999?

4 A I think I did. There was a time, it might have
5 been before, and I will have a copy of that deed so that you
6 can see just when the transaction was paid.

7 Q The developed property on Catherine's Rest for
8 which there is that \$200 per month rent --

9 A Yes, along with the four apartments, two-story.
10 There's a two-story, four apartment, which I told you is in
11 the bank.

12 Q Right now I'm not worried about the properties
13 that the bank has foreclosed on. I'm only focusing on the
14 properties that are not under the bank foreclosure order. I
15 understood that there was an undeveloped property on
16 Catherine's Rest that had about a \$200 monthly rental.

17 A That's a small apartment that we have that is now
18 presently rented. That's our own.

19 Q And is that property in the name of your wife
20 alone?

21 A I think it should be in both names. Again, I'll
22 have to check. I'll have to check Catherine's Rest to see
23 just whose name is on the list. Okay? I may be wrong. If
24 I'm wrong, I'll stand to be corrected.

25 Q We'll be able to correct these things if it turns

1 out --

2 A Sure.

3 Q -- that what you've said --

4 MR. COLBY: We'll simply give you a list, Mr.
5 Shook, with the correct information. I'll have him search
6 title on all these properties and then I'll have him give
7 you a list.

8 BY MR. SHOOK:

9 Q Was there a time when that property was in your
10 name alone?

11 A Could be possible.

12 Q Do you know how you came to own it in the first
13 place?

14 A Yes, I said that it was owned by my father and
15 mother and upon their demise it turned over to the brothers.
16 We had, there were four brothers. Okay? Then, it was all
17 turned over to me. So when I do the title search I'll be
18 able to show you exactly what's what, and if there is any
19 other land that I do own I will, and I do a title search, I
20 will send it to Mr. Colby so he can give it to you.

21 Q The only other one that you've mentioned thus far
22 that is not under the bank foreclosure is the Western Suburb
23 property in Christiansted.

24 A Western Suburb's not. No, Western Suburb and 82
25 and 83 aren't on that.

1 Q No. We've already gone over 82 and 83. I mean,
2 we've talked about 83. We've talked about 82. We've talked
3 about the undeveloped land on Catherine's Rest and now we've
4 talked about the property that has the small apartment on
5 Catherine's Rest.

6 A The small apartment's 6A.

7 Q So the only other property that you had mentioned
8 before that is not under the bank foreclosure order is the
9 property in the Western Suburb area of Christiansted, the
10 undeveloped land.

11 A No. Sir, when you use the term that is not under
12 the bank foreclosure, the bank foreclosure only houses, has
13 4A, 6A, 4A La Grande Princess, 6A La Grande Princess and 4C
14 La Grande Princess and 6H Catherine's Rest.

15 Q Right. I think we have that understanding.

16 A Okay. I just want to make certain of that.

17 Q So the only other property that we still need to
18 go over at this point is the Western Suburb property?

19 A Western Suburb and Catherine's Rest property.

20 Q Well, we just talked about two aspects of
21 Catherine's Rest. One being the undeveloped land and then
22 the other being the small apartment that produces the
23 monthly rental.

24 A The undeveloped land of 12 acres of land.

25 Q Correct.

1 A And the rental of the small unit.

2 Q Right. That takes care of Catherine's Rest.

3 A No, and then the 6H Catherine's Rest is with the
4 bank. That's what I told you.

5 Q No, I understood --

6 A The two-story building.

7 Q Right, I'm not --

8 A Concrete. Okay.

9 Q -- focusing on any of the properties that --

10 A The bank.

11 Q -- the bank is involved with.

12 A Thank you.

13 Q The Western Suburb property though is that
14 currently in your wife's name or your name.

15 A I've got to check it, sir, to let you know, I'll
16 be honest with you.

17 Q Was there a time when that property was in your
18 name alone?

19 A Could be.

20 Q Do you know whether there are any other properties
21 that we have not talked about at this point that are in your
22 name or you own.

23 A I don't recall of any other that I may have.

24 Q Are you saying that there may be other properties
25 that you have that you just don't remember at the moment?

1 A No.

2 Q I'll ask again, is there another property that you
3 may own that you simply don't remember at this point?

4 A No. I'm saying, well I know I had the property
5 at, up in town, but I lost that property, and then I had
6 another property and I'm certain I lost that, but I tell you
7 what I will do, when I return to St. Croix I will get the
8 name of the property and the number, send it to you and let
9 you know what rights I had with that and what I have lost of
10 it, but I know for sure what I've given you here is correct.

11 Q And when you say here, you're pointing to --

12 A Oh, well, all the properties that we have listed
13 here.

14 Q All the properties that we've talked about to this
15 point?

16 A Yes, sir.

17 MR. SHOOK: Lauren, if you want to break now we
18 could do that.

19 MR. COLBY: We can break now, because I usually
20 eat at 11:30 a.m. in Frederick.

21 (Whereupon, at 12:17 p.m., the deposition in the
22 above-entitled matter recessed, to reconvene at 1:00 p.m.
23 this same day Thursday, November 14, 2002.)

24 //

25 //

1 THE WITNESS: 1962.

2 BY MR. SHOOK:

3 Q What did you do after that?

4 A After that I was promoted in government and I went
5 from one job to another.

6 Q This is the government of the Virgin Islands?

7 A Government of the Virgin Islands, right, until I
8 became the assistant to the Governor of the Virgin Islands
9 in public relations.

10 Q Is that position from which you retired?

11 A No, no, no. Then I went back to teaching again.

12 Q When did you resume teaching?

13 A In 1971 I became the assistant principal of a
14 school, in 1970, I became the assistant principal of the Lew
15 Muckle School.

16 Q So you worked in government from 1962 to 1970?

17 A You mean 1950.

18 Q Well, I understood that you graduated from Howard
19 University in 1950.

20 A Yes.

21 Q Then you became a school teacher.

22 A That's for government.

23 Q Oh, okay. Well, all right. Let me try that
24 again.

25 A Okay, sir.

1 Q Okay. You graduated from Howard University in
2 1950. You were a school teacher from 1950 to 1962.

3 A That's correct.

4 Q Then you took a slightly different tact and
5 worked --

6 A In different government agencies.

7 Q In the Virgin Islands?

8 A Yes, sir.

9 Q And that was until what year?

10 A Until 1970 and then I became the assistant
11 principal of, back in school again, of the Lew Muckle
12 School.

13 Q Why don't you spell that for the court reporter?

14 A Lew is L-E-W, Muckle, M-U-C-K-L-E.

15 Q You were in that position for how long?

16 A Just one year and then I went back to law school.

17 Q Where did you go to law school?

18 A At Howard University.

19 Q And how many, when did you graduate, did you
20 graduate from Howard University?

21 A 1974.

22 Q 1974. At that point did you become licensed to
23 practice law?

24 A Yes.

25 Q In the Virgin Islands?

1 A But in that, the very same year I became, I was
2 made the first adjutant general of the Virgin Islands Army
3 National Guard. We started a National Guard in that year.
4 I became the first adjutant general.

5 Q That was in 1974?

6 A Yes, sir.

7 Q In 1974 did you also become licensed to practice
8 law?

9 A Yes, sir.

10 Q Now was it in the Virgin Islands alone or was it
11 in the Virgin Islands plus some other locals?

12 A We're under the Third Circuit.

13 Q Well, in terms of your law license, is your law
14 license particularly --

15 A I can practice in the Virgin Islands and we are
16 under the Third Circuit, which is Philadelphia, and then I
17 came up in 1977. I was admitted to the Supreme Court.

18 Q Do you still have your license to practice law?

19 A Yes, sir.

20 Q Did there come a time when you opened a law
21 practice?

22 A Well, I started from 1974, although I was adjutant
23 general I started working doing legal work in 1974.

24 Q With whom or with what did you start doing legal
25 work in 1974?

1 A By myself, and then in 1976 I stopped from being
2 the adjutant general and then I went into full-time legal
3 work.

4 Q So there has been full-time legal work since 1976?

5 A Up to the present day.

6 Q Has your legal practice always been solo?

7 A All by myself. I've never been a partner, no one.

8 Q Was there a period of time when any of your
9 children worked for you at the law office?

10 A Well, my daughter is an attorney and she has been
11 in my office doing things.

12 Q Are you saying then that she was an employee of
13 yours for a time?

14 A Not an employee, but she would come in there and
15 do things for me.

16 Q Was she on --

17 A At that time I had or I usually had a lot of -- I
18 had a secretary as many as two secretaries at one time, and
19 at the present time I'm all by myself. I do all my
20 secretarial work on my computer, everything. I have no
21 secretary now.

22 Q Now when you say your daughter helped, in what
23 capacity did she help? I mean, what kind of job did she
24 have?

25 A It wasn't a job per se, either than she would type

1 things for me or do some legal research for me.

2 Q What time period are we talking about here?

3 A Well, I said, it was just if I needed help, I'll
4 call her and tell her I need her to type something or
5 anything of the sort.

6 Q Does that situation continue to the present?

7 A Up to now sometimes she types things, sure.

8 Q How long has your daughter been providing the kind
9 of help that you've just described?

10 A Well, if I need assistance and I say I need
11 something typed she will type it at any time. So I just
12 hand it to her and she types it.

13 Q Right. What I'm getting at is when did this
14 situation first start?

15 A Well, when she came home. Now I don't recall when
16 she came home to be honest with you. I don't recall. I
17 don't even recall what year she finished law school, when
18 she finished Howard University School of Law.

19 Q So after she finished law school was when she
20 provided the help that you're talking about in the office?

21 A When she came home, because she was living up here
22 first before she came home. As I mentioned to you that all
23 of her children were born up here.

24 Q Up here meaning within the continental United
25 States?

1 A Well, they were living here in Washington. Her
2 husband was in the Marines and then she spent time with him
3 in South Carolina, North Carolina. They were living down
4 there for years and then came home.

5 Q Does your legal practice provide you with a source
6 of income?

7 A Well, that's what keeps me alive.

8 Q Well, I understand that the practice of law can be
9 stimulating and can keep one alive, but depending on your
10 clients it may or may not pay bills. So my question is more
11 focused on not so much whether it's stimulating for you, but
12 whether or not you receive any income.

13 A Well, I get some kind of an income from it.
14 Great? No. Since I'm all by myself. When I say all by
15 myself doing my secretarial work, et cetera, things are
16 really slow, really slow. I guess soon I'll say, that's it.

17 Q You're actually contemplating retirement?

18 A Yes, sir.

19 Q That's not a bad thing.

20 A On December 8th, I will be 77 years of age, sir.

21 MR. COLBY: How old?

22 THE WITNESS: Seventy-seven years of age, December
23 8th.

24 BY MR. SHOOK:

25 Q So you law practice does provide some kind of

1 income.

2 A Some kind of income.

3 Q Are there any sources of income other than the law
4 practice for you? You don't get social security at this
5 point?

6 A Well, I'm getting social security. That's what is
7 do at some point.

8 Q Right. I'm looking for whatever.

9 A Yes. I get social security and I get a retirement
10 check from the Government of the Virgin Islands, every 15th,
11 the 1st and the 15th, from the Government of the Virgin
12 Islands and every 2nd, 3rd day of each month I get a check
13 from social security.

14 Q Does Family Broadcasting, Inc. provide any income?

15 A Well, I never taken an income from them. We
16 Family Broadcasting we have to pay bills.

17 Q With the law practice do you have an office
18 outside of the home?

19 A Yes, sir.

20 Q Is that office something that you rent or
21 something that you own?

22 A It's in the same building 6A, 6A La Grande
23 Princess. This is wrong.

24 Q How long have you had your law office at 6A La
25 Grande Princess?

1 A I have been there now from, I would say from about
2 1982, from 1982, sir, it was in the 1980s when I went there,
3 I've been there and I'm still there.

4 Q For Family Broadcasting is the studio where Family
5 Broadcasting has the stations --

6 A Same place.

7 Q -- broadcasting equipment?

8 A Same place. It's called Fort Louise Augusta.

9 Q Is the property there owned Family Broadcasting?

10 A No, sir.

11 Q It's rented?

12 A The property is owned by the Government of Virgin
13 Islands.

14 Q So how is it that Family Broadcasting is there?
15 Does Family Broadcasting rent property from the government?

16 A Yes, we rent from the government. We're supposed
17 to be paying the government \$450 a month for the rental of
18 the property, but I must be honest with you we haven't paid
19 the government for a long time because of the fact that we
20 give a lot of free time to the government on the radio. For
21 instance, public safety has a program every Saturday on the
22 radio for one hour, from 3:00 until 4:00.

23 Q So basically instead of the government charging
24 you rent each month they take their rent in the form of the
25 time that Family Broadcasting gives?